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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

DECLARATION OF JEFF NARDINELLI

1 I, Jeffrey W. Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC (“Waymo”). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Waymo has produced documents referenced in the second paragraph of Waymo’s
7 opposition to Uber’s motion to compel at the following Bates numbers and ranges: WAYMO-
8 UBER-00004093-4329; WAYMO-UBER-00031973-32529; WAYMO-UBER-00032540;
9 WAYMO-UBER-00031431-446; WAYMO-UBER-00031464-554; WAYMO-UBER-00031612,
10 WAYMO-UBER-00031636-801, WAYMO-UBER-00031818-972; WAYMO-UBER-00032541.

11 3. Waymo has produced a document entitled “Chauffeur Commercialization Status
12 Update” dated December 5, 2012, at Bates number WAYMO-UBER-00020826-899. Waymo has
13 produced a document entitled “Waymo Scaling Strategy” dated March 22, 2017, at Bates number
14 WAYMO-UBER-00032218-283.

15 4. Waymo has produced a document entitled “Chauffeur Business Plan” dated
16 November 6, 2013, at Bates number WAYMO-UBER-00031464-552. Waymo has produced a
17 document reflecting the ongoing discussions referenced in the brief at Bates number WAYMO-
18 UBER-00032176-217.

19 5. Waymo has produced a document entitled “Chauffeur Update” dated October 11,
20 2016, at Bates number WAYMO-UBER-00031636 (produced natively).

21 6. Waymo has produced a one-page slide, dated October 21, 2016, at Bates number
22 WAYMO-UBER-00031972. Waymo has produced a 61-page slide presentation entitled
23 “Chauffeur Plan 2017,” dated November 8, 2016, at Bates number WAYMO-UBER-00031637-
24 697.

25 7. Waymo has produced the data referenced in the brief at Bates number WAYMO-
26 UBER-00004234-329.

27 8. Waymo has produced its P&L (comprising 13 spreadsheets) at Bates number
28 WAYMO-UBER-00032541 (produced natively).

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